

Commissioners: Has Broadband Technology progressed to the necessary level to permit its use throughout the country in the form and formats currently presented?

Every power line carrying BPL would serve as an antenna and radiate RF. Even low power RF has the potential to reflect off the ionosphere and return to earth at a distant point. Multiple BPL providers on different frequencies could then cause wide spread interference across the radio spectrum. Licensed radio service users and government agencies within our country and possibly throughout large portions of the world would be susceptible to this interference. Have independent and unbiased studies been conducted to demonstrate the claimed absence of interference to licensed radio service users and government agencies, both direct and reflected, including fixed, maritime, aeronautical, broadcast and mobile operations?

In home BPL systems would carry RF throughout the electrical wiring of every structure on that system. What do the BPL providers have planned to prevent RF from being injected into every electronic device drawing power off the system?? Or would it be the responsibility of the individual to install devices necessary to protect their equipment?

Would not the power lines also receive RF from licensed radio service users, and would this RF interfere with and possibly disrupt the BPL signals? Who would then be required to make adjustments to prevent the further interference?

I cannot fathom the explanation that BPL providers will be able to quickly adjust their emission frequencies to avoid interfering with all those in the licensed radio service. The wide potential of use just within the amateur spectrum is staggering.

When BPL providers cause interference, what standard of response must they meet? What reporting requirements must they maintain? How can source interference be identified when it is from RF reflected off the ionosphere?

Too many questions still remain unresolved in the push to make BPL a reality to every corner of our country in the near future. I would offer that BPL be restricted to a non-interfering portion of the radio spectrum, if at all possible. Further, that they not be allowed to operate under Part 15, but must be licensed and held to the strict standards as others in the licensed radio service. In this way the technology can be put into use and continue to evolve without interfering with current licensed users of the spectrum.

Respectfully submitted.